

**REMARKS**

The Office Action mailed June 10, 2005, has been received and reviewed. Claims 1 through 26 are currently pending in the application. Claims 1 and 5 stand rejected. Claims 2 through 4 and 6 through 26 have been objected to, and the indication of allowable subject matter is noted with appreciation. Applicant has amended claims 1 and 14, and respectfully requests reconsideration of the application as amended herein.

Claim 1 has been amended to address an objection to the specification, and to further specify the nature of the claimed “at least one opening.”

Claim 14 has been amended to address an objection to the specification.

**Objections to Specification**

Applicant acknowledges, with appreciation, the objections to the specification as failing to provide antecedent basis for the claimed subject matter. Applicant has amended claims 1 and 14, albeit in a somewhat different manner than suggested by the Examiner in order to enhance the clarity of the claim language. Review and approval of Applicant’s amendatory language is respectfully requested.

**35 U.S.C. § 102(b) Anticipation Rejections**

**Anticipation Rejection Based on U.S. Patent No. 6,208,525 to Imasu et al.**

Claims 1 and 5 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Imasu et al. (U.S. Patent No. 6,208,525). Applicant respectfully traverses this rejection, as hereinafter set forth.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Brothers v. Union Oil Co. of California*, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). The identical invention must be shown in as complete detail as is contained in the claim. *Richardson v. Suzuki Motor Co.*, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Claim 1, as amended herein, requires “at least one opening substrate separate from the plurality of recesses extending through the interposer substrate, the at least one opening being in

communication with the gaps.” Applicant, in reviewing the Examiner’s rejection in reliance upon Imasu et al., FIG. 12, as anticipatory, has some difficulty in appreciating the Examiner’s assertion that the reference describes “at least one opening extending through the interposer substrate,” since neither FIG. 12 nor the other drawing figures appear to depict, nor the specification describe, an opening through the top layer (19 in FIG. 12) of a multilayer substrate and in communication with the gaps adjacent conductive bumps. If the Examiner is taking the position that the at least one opening is a mouth of a recess, this would seem to be inappropriate, since a recess cannot be in communication with itself. However, to further clarify Applicant’s invention and not for purposes of restricting the scope thereof, Applicant has now recited that the at least one opening extending through the interposer substrate is separate from the plurality of recesses as well as being in communication with the gaps.

Applicant respectfully submits that claim 1 is not anticipated, and respectfully requests withdrawal of the rejection.

Claim 5 is allowable as depending from claim 1 and, further, as Imasu et al. fails to describe an opening in communication with the gaps and which is formed through an *opposing* (by reference to claim 1, line 3) second surface of the interposer substrate. In Imasu et al., the “first” surface in which the recesses are formed in the dielectric member (top portion of 19) appears to be the only surface in which an opening is formed. As recited in claim 5, the at least one opening is formed in the opposing second surface and is in communication with the gaps, by incorporation of the subject matter of claim 1.

Applicant respectfully submits that claim 5 is not anticipated, and respectfully requests withdrawal of the rejection.

#### **Objections to Claims/Allowable Subject Matter**

Claims 2 through 4 and 6 through 13 are objected to as being dependent upon rejected base claims, but are indicated to contain allowable subject matter and would be allowable if placed in appropriate independent form. Applicant respectfully asserts that claims 1 through 4 and 6 through 13 are allowable in their present form, as depending from claim 1.

Claims 14 through 26 are objected to under 35 U.S.C. 112, 2<sup>nd</sup> paragraph, but would be

allowable if rewritten to include all of the limitations of the base claim and any intervening claims. Applicant respectfully notes that claim 14 is already an independent claim, and has not been rejected on the merits. Applicant has amended claim 14 to address the Examiner's objection to the specification, and respectfully notes that no rejection under 35 U.S.C. 112, 2<sup>nd</sup> paragraph, is present in the outstanding Office Action. Applicant respectfully submits that claims 14 through 26 are in condition for allowance.

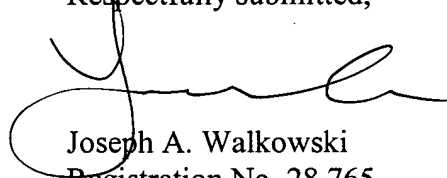
### **ENTRY OF AMENDMENTS**

The amendments to claims 1 and 14 above should be entered by the Examiner because the amendments are supported by the as-filed specification and drawings and do not add any new matter to the application.

### **CONCLUSION**

Claims 1 through 26 are believed to be in condition for allowance, and an early notice thereof is respectfully solicited. Should the Examiner determine that additional issues remain which might be resolved by a telephone conference, he is respectfully invited to contact Applicant's undersigned attorney.

Respectfully submitted,



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Date: September 7, 2005

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